

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION - DETROIT

J&J SPORTS PRODUCTIONS, INC .

Plaintiff

L A J, LLC D/B/A "PLUSH ULTRA
LOUNGE AND,
ANTHONY MCCREE, JR., an individual, and
KELLY A. ALLEN, an individual, and
LAURA PETERS, an individual, and
LUKE BARNES, an individual,
Jointly and Severally,

Defendants.

**MOTION FOR LEAVE TO
WITHDRAW AS COUNSEL**

Civil Action No. 2:14-cv-12239-LPZ-MJH
Hon.Lawrence P. Zatkoff

MOTION FOR LEAVE TO WITHDRAW AS COUNSEL AND BRIEF IN SUPPORT

The undersigned counsel, of the law firm Gerald A. Sniderman & Associates, hereby seeks leave to withdraw his appearance and that of the law firm on behalf of Defendant Anthony McCree, Jr. In support of this motion, counsel states:

1. There has been an irreparable breakdown in communication and understanding between Michael Linardos and Anthony McCree, Jr., as to the purpose and meaning of legal representation that makes it impossible for Michael Linardos to effectively represent Anthony McCree in this matter.

2. After being advised that his legal insurance will no longer pay for representation in this matter, Mr. McCree has informed Michael Linardos that he wishes to terminate the attorney-client relationship at this time.

3. Counsel has spoken to Mr. McCree on numerous occasions regarding the termination of representation, and Mr. McCree is in concurrence on this motion.

4. Michael Linardos has taken reasonable steps to avoid any foreseeable prejudice to the rights of Mr. McCree. Notice of this motion has been provided to Mr. McCree

5. Michael Linardos stands ready to deliver to Anthony McCree, Jr., all papers and property to which the client is entitled.

WHEREFORE, the undersigned counsel and Gerald Sniderman and Associates request that the court enter an order permitting counsel to withdraw his and the law firm's appearance.

Respectfully Submitted,

/s/Michael Linardos

MICHAEL LINARDOS (P62114)

Attorney for Defendant Anthony McCree, Jr.

Huntington Woods, MI 48070

(248)548-1200

BRIEF IN SUPPORT OF MOTION FOR LEAVE TO WITHDRAW AS COUNSEL

Michael Linardos, as attorney for Defendant Anthony McCree Jr, moves for leave to withdraw as counsel in this matter because.

LR 83.30 (a) provides that “ Withdrawal of appearances may be accomplished only by leave of Court on motion of counsel”.

MRPR Rule 1.16 allows for termination of representation for “good cause”, and requires that the withdrawing lawyer “shall take steps to the extent reasonably practicable to protect a client's interests”. (Model Rules of Professional Responsibility Rule 1.16 (2013)

Relief Requested

Defendant requests that the court grant leave for Michael Linardos to withdraw as counsel for Defendant Anthony McCree, Jr.

Respectfully Submitted,

Dated: May 13, 2015

/s/Michael Linardos
MICHAEL LINARDOS (P62114)
Attorney for Defendant Anthony McCree
26339 Woodward Ave.
Huntington Woods, MI 48070
Phone: (248) 548-1200

CERTIFICATE OF CONFERENCE

I, Michael Linardos, certify that on 5/13/15 I conferred with counsel for Plaintiff, Clinton J. Hubbell, regarding the issues contained in the motion, and counsel has indicated that they do not oppose this motion.

/s/Michael Linardos
Michael Linardos (P62114)

CERTIFICATE OF SERVICE

I, Attorney for ANTHONY MCCREE, JR, hereby certify that I have served a copy of the foregoing Motion on the below persons via US mail on this 13th day of May, 2015:

Anthony Mc Cree, Jr,
24280 Ridgedale Street
Oak Park, MI 48237

Clinton J. Hubbell
Hubbell DuVall PLLC
25140 Lahser Road, Suite 271
Southfield, MI 48033-2753

/s/Michael Linardos
Michael Linardos (P62114)